

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

**NOKIA TECHNOLOGIES OY,**

**Plaintiff,**

**v.**

**LENOVO (SHANGHAI) ELECTRONICS  
TECHNOLOGY CO. LTD., LENOVO GROUP,  
LTD., LENOVO BEIJING, LTD., LENOVO PC  
HK LIMITED, AND LENOVO (UNITED  
STATES), INC.,**

**Defendants.**

**CIVIL ACTION NO.**

**5:19-cv-00427-BO**

**JURY TRIAL DEMANDED**

**NOKIA’S UNOPPOSED MOTION FOR LEAVE TO FILE FIRST AMENDED  
COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiff Nokia Technologies Oy (“Nokia”), by and through its undersigned counsel, respectfully submits this Motion for Leave to File First Amended Complaint. This motion is accompanied by Nokia’s proposed First Amended Complaint and a brief that sets forth the reasons that leave to amend should be granted. For the reasons stated therein, Nokia respectfully requests the Court grant leave to file its First Amended Complaint.

Dated the 2<sup>nd</sup> day of July, 2020.

/s/ Theodore Stevenson, III

---

Theodore Stevenson, III  
TX State Bar No. 19196650  
tstevenson@mckoolsmith.com  
Warren Lipschitz  
TX State Bar No. 24078867  
wlipschitz@mckoolsmith.com  
Richard Kamprath  
TX State Bar No. 24078767  
rkamprath@mckoolsmith.com  
Albert M. Suarez IV  
asuarez@mckoolsmith.com  
TX State Bar No. 24113094  
MCKOOL SMITH, PC  
300 Crescent Court, Suite 1500  
Dallas, TX 75201  
Telephone: (214) 978-4000  
Telecopier: (214) 978-4044

*COUNSEL FOR PLAINTIFF NOKIA  
TECHNOLOGIES OY*

/s/ Matthew P. McGuire

Matthew P. McGuire  
N.C. State Bar. No. 20048  
ALSTON & BIRD LLP  
555 Fayetteville Street, Suite 600  
Raleigh, NC 27601  
Telephone: (919) 862-2200  
Facsimile: (919) 862-2260  
E-mail: matt.mcguire@alston.com

*LOCAL CIVIL RULE 83.1(D) COUNSEL  
FOR PLAINTIFF NOKIA TECHNOLOGIES OY*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2020, I electronically filed the foregoing Unopposed Motion for Leave to File First Amended Complaint with the Clerk of Court using the CM/ECF system, which will send notification of such filing and effectuate service to the counsel of record in this matter.

**ALSTON & BIRD LLP**

/s/ Matthew P. McGuire

Matthew P. McGuire

N.C. State Bar. No. 20048

ALSTON & BIRD LLP

555 Fayetteville Street, Suite 600

Raleigh, NC 27601

Telephone: (919) 862-2200

Facsimile: (919) 862-2260

E-mail: matt.mcguire@alston.com

*LOCAL CIVIL RULE 83.1(D) COUNSEL  
FOR PLAINTIFF NOKIA TECHNOLOGIES OY*